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10 *Attorneys for Defendants*

11 UNITED STATES DISTRICT COURT
12
13 NORTHERN DISTRICT OF CALIFORNIA
14
15 OAKLAND DIVISION

15 ZOYA KOVALENKO,

16 Plaintiff,

17 v.

18 KIRKLAND & ELLIS LLP, MICHAEL DE
19 VRIES, MICHAEL W. DE VRIES, P.C.,
ADAM ALPER, ADAM R. ALPER, P.C.,
20 AKSHAY DEORAS, AKSHAY S. DEORAS,
P.C., AND MARK FAHEY,

21 Defendants.
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Case No. 4:22-cv-05990-HSG (TSH)

**DEFENDANTS' STATEMENT IN
SUPPORT OF PLAINTIFF ZOYA
KOVALENKO'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PLAINTIFF'S OPPOSITION TO
FILIPPATOS PLLC'S MOTION TO
QUASH AND DECLARATION IN
SUPPORT OF OPPOSITION (DKT NO.
232)**

DEFENDANTS' STATEMENT IN SUPPORT OF
PLAINTIFF'S ADMINISTRATIVE MOTION TO
FILE UNDER SEAL PLAINTIFF'S OPPOSITION
TO FILIPPATOS PLLC'S MOTION TO QUASH
[4:22-CV-05990-HSG (TSH)]

Pursuant to Civil Local Rule 7-11(b), Defendants Kirkland & Ellis LLP, Michael De Vries, Michael W. De Vries, P.C., Adam Alper, Adam R. Alper, P.C., Akshay Deoras, Akshay S. Deoras, P.C., and Mark Fahey (collectively, the “Defendants”) respectfully submit this Statement in Support of Plaintiff Zoya Kovalenko’s Administrative Motion to File Under Seal Plaintiff’s Opposition to Filippatos PLLC’s Motion to Quash and Declaration in Support of Opposition (Dkt. No. 232) (the “Motion to Seal”).

Good cause exists to seal the redactions identified in the Motion to Seal for the reasons stated therein. Declaration of Zoya Kovalenko ISO Motion to Seal (Dkt. No. 232-1) (“Kovalenko Decl.”) ¶ 4. Disclosure of this information would prejudice both Defendants’ and Plaintiff’s interests in this action. *Id.* Less restrictive alternatives to sealing are not available, as Plaintiff has tailored her request to redact only confidential information. Kovalenko Decl. ¶ 5.

In light of the foregoing, Defendants respectfully request that the Court grant the Motion to Seal.¹

Dated: May 12, 2025

JOSEPH C. LIBURT
Orrick, Herrington & Sutcliffe LLP

By: /s/ Joseph C. Liburt
Joseph C. Liburt
Attorneys for Defendants

¹ In accord with Civil Local Rule 7-11(b), Defendants hereby adopt Plaintiff’s amended proposed order granting the Motion to Seal. Dkt. No. 234.